

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**MERCED IRRIGATION DISTRICT, on  
behalf of itself and all others similarly  
situated,**

**Plaintiff,**

**v.**

**BARCLAYS BANK PLC,**

**Defendant.**

**No. 1:15-cv-04878-VM-GWG**

**PLAINTIFF'S NOTICE OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF PROPOSED SETTLEMENT, CERTIFICATION OF A SETTLEMENT CLASS,  
AUTHORIZATION TO DISSEMINATE CLASS NOTICE, APPOINTMENT OF CLASS  
COUNSEL, AND THE SCHEDULING OF A HEARING FOR  
FINAL APPROVAL OF PROPOSED SETTLEMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum in Support of Preliminary Approval of Proposed Settlement, Certification of a Settlement Class, Authorization to Disseminate Class Notice, Appointment of Class Counsel, and the Scheduling of a Hearing for Final Approval of Proposed Settlement; the Joint Declaration of Solomon B. Cera and Jeffrey A. Klafter and the exhibits thereto; and upon all prior papers and proceedings herein as well as such further argument as the Court may allow at any hearing on the motion, Plaintiff Merced Irrigation District hereby moves this Court for entry of the Preliminary Approval Order submitted herewith, pursuant to Rules 23(a), 23(b)(3), 23(e), and 23(g) of the Federal Rules of Civil Procedure, that: (i) preliminarily approves the proposed settlement of this class action; (ii) certifies the Settlement Class; (iii) authorizes dissemination of the Notice of Proposed Class Action Settlement with Barclays Bank PLC and Hearing on Settlement Approval; (v) appoints Cera LLP and Klafter Olsen & Lesser LLP as class counsel; and (vi) schedules a hearing for

final approval of Settlement. Defendant consents to this motion and entry of the Preliminary Approval Order submitted herewith.

Dated: April 13, 2018

Respectfully submitted,

/s/ Jeffrey A. Klafter

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2018, a true and correct copy of the foregoing was served electronically. Notice of this filing will be sent by operation of the Court's CM/ECF system to all parties shown on the electronic filing receipt.

/s/ Solomon B. Cera  
Solomon B. Cera